

16 CV 1830

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORKRECEIVED  
SDNY PRO SE OFFICE

2016 MAR 11 AM 9:04

Dr. Richard Sunday Ifill, Felix Morales,  
R. Colon, Clifford Taylor, Westley Bautista,  
Marcus Wilson, Roderick Gray, Brian Plummer, Dween Blackman

(In the space above enter the full name(s) of the plaintiff(s).)

ORLANDO HAMILTON

-against-

## COMPLAINT

under the

Civil Rights Act, 42 U.S.C. § 1983

(Prisoner Complaint)

Jury Trial: ☒ Yes ☐ No  
(check one)The City of New York, New York County  
Supreme Court, Bronx County Supreme Court,  
Brooklyn County Supreme Court, Queens  
County Supreme Court, District Attorney  
New York County, District Attorney Bronx  
County, District Attorney Brooklyn County,  
District Attorney Queens County, The  
Legal Aid Society, New York County Bar  
Association, New York City Commissioner  
for Corrections and Mayor DeBlasio, Mayor  
of New York.Also Title 18, Sections  
241, 242, Title 42, Sec.  
1985 and 1986

JURY TRIAL

(In the space above enter the full name(s) of the defendant(s). If you  
cannot fit the names of all of the defendants in the space provided,  
please write "see attached" in the space above and attach an  
additional sheet of paper with the full list of names. The names  
listed in the above caption must be identical to those contained in  
Part I. Addresses should not be included here.)

## I. Parties in this complaint:

- A. List your name, identification number, and the name and address of your current place of
- 
- confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper
- 
- as necessary.

Plaintiff Name Dr. Richard Sunday Ifill 349-14-00294  
ID # Spiritual Leader of S.L.G. Youth Inc.  
Current Institution Rikers Island, 15-15 Hazen Street. GMDC  
Address East Elmhurst, New York 11370

- B. List all defendants' names, positions, places of employment, and the address where each defendant
- 
- may be served. Make sure that the defendant(s) listed below are identical to those contained in the
- 
- above caption. Attach additional sheets of paper as necessary.

Defendant No. 1 Name THE CITY OF NEW YORK Shield # \_\_\_\_\_  
Where Currently Employed \_\_\_\_\_  
Address \_\_\_\_\_

PLAINTIFFS CONTINUED

Felix Morales

GMDC  
15-15 Hazen Street

R. Colon  
GMDC  
15-15 Hazen Street  
East Elmhurst, New York 11370

Clifford Taylor  
GMDC  
15-15 Hazen Street  
East Elmhurst, New York 11370

Marcus Wilson  
GMDC  
15-15 Hazen Street  
East Elmhurst, New York 11370

Roderick Gray # 113-15-00960  
GMDC  
15-15 Hazen Street  
East Elmhurst, NY 11370

Brian Plummer  
GMDC  
15-15 Hazen Street  
East Elmhurst, NY 11370

Dween Blackman 441-15-07246  
15-15 Hazen Street, GMDC  
East Elmhurst, NY 11370

1-B

WESTLEY BAUTISTA # 241-15-03048  
15-15 HAZEN ST - GMDC  
EAST ELMHURST, NY 11370

ORLANDO HAMILTON # 241-14-10192  
15-15 HAZEN ST GMDC  
EAST ELMHURST, NY 11370

DEFENDANTS CONTINUED

District Attorney's from:

1. New York County,
2. Bronx County,
3. Brooklyn, County,
4. Queens County.

The Legal Aid Society;

The New York City Bar Association,

Mayor DeBlasio, Mayor of New York,

Commission of New York City Department of Corrections,  
Astoria Blvd.

Rikers Island

East Elmhurst, New York 11370

Defendant No. 2 Name New York County Supreme Court Shield # \_\_\_\_\_  
Where Currently Employed \_\_\_\_\_  
Address \_\_\_\_\_

Defendant No. 3 Name Bronx County Supreme Court Shield # \_\_\_\_\_  
Where Currently Employed \_\_\_\_\_  
Address \_\_\_\_\_

Defendant No. 4 Name Brooklyn County Supreme Court Shield # \_\_\_\_\_  
Where Currently Employed \_\_\_\_\_  
Address \_\_\_\_\_

Defendant No. 5 Name Queens County Supreme Court Shield # \_\_\_\_\_  
Where Currently Employed \_\_\_\_\_  
Address \_\_\_\_\_

See attached sheet 2-B

**II. Statement of Claim:**

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. In what institution did the events giving rise to your claim(s) occur?  
Rikers Island, GMDC, C-73

B. Where in the institution did the events giving rise to your claim(s) occur?  
The whole complete Rikers Island  
(See attached Civil Rights Complaint for full details)

C. What date and approximate time did the events giving rise to your claim(s) occur?  
Over a period of 2 years, From 2013 through 2015  
and still happening (see attached Civil Rights Complaint  
for full details)

D. Facts: Defective Indictments, False Arrest, Unlawful Imprisonment, Conditions that threatens Plaintiffs health, and life, puts them at risk for death.

What happened to you?

(See the attached Civil Rights Complaint for full details).

Who did what?

Was anyone else involved?

Who else saw what happened?

### III. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

See attached brief

### IV. Exhaustion of Administrative Remedies:

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted." Administrative remedies are also known as grievance procedures.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

Yes ~~xx~~ No

If YES, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

Rikers Island, GMDC, C-73, 15-15 Hazen Street  
East Elmhurst, NY 11370

B. Does the jail, prison or other correctional facility where your claim(s) arose have a grievance procedure?

Yes \_\_\_\_ No xx Do Not Know \_\_\_\_

C. Does the grievance procedure at the jail, prison or other correctional facility where your claim(s) arose cover some or all of your claim(s)?

Yes \_\_\_\_ No \_\_\_\_ Do Not Know \_\_\_\_

If YES, which claim(s)? \_\_\_\_\_

D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose?

Yes xx No \_\_\_\_

If NO, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

Yes \_\_\_\_ No \_\_\_\_

E. If you did file a grievance, about the events described in this complaint, where did you file the grievance?

1. Which claim(s) in this complaint did you grieve? all of them

2. What was the result, if any? none

3. What steps, if any, did you take to appeal that decision? Describe all efforts to appeal to the highest level of the grievance process. \_\_\_\_\_

Wrote to the Warden, Commissioner, Mayor, Governor,  
President Obama, United States Department of Justice,  
to Congress, Senator Perkins, Congressman Charles Rangel,  
Assemblyman Keith Wright, the Press. (see attached brief).

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here: \_\_\_\_\_

The alleged grievance committee here at C-73 does not

conform to the Directive, it does not operate under the  
established director, the supervisor makes all of the  
decisions herself. (see attached brief)

2. If you did not file a grievance but informed any officials of your claim, state who you informed, \_\_\_\_\_



when and how, and their response, if any: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies. \_\_\_\_\_  
\_\_\_\_\_

~~Plaintiffs life and lives are in great danger of death~~  
~~because of the conditions that poses a serious threat to our~~  
~~life, health, safty and freedom, as we are are unlawfully~~  
~~in prison (see attached brief).~~

**Note:** You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.

**V. Relief:**

State what you want the Court to do for you (including the amount of monetary compensation, if any, that you are seeking and the basis for such amount). 150 Million Dolars,

Create a New Legal System that follows the United States Const-  
itution, Release all plaintiffs from their unjust, illegal and  
unlawful imprisonment. (See attached brief).

**VI. Previous lawsuits:**

- A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

Yes \_\_\_\_ No xx

On  
these  
claims

- B. If your answer to A is YES, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another sheet of paper, using the same format.)

1. Parties to the previous lawsuit:

Plaintiff \_\_\_\_\_

Defendants \_\_\_\_\_

2. Court (if federal court, name the district; if state court, name the county) \_\_\_\_\_

3. Docket or Index number \_\_\_\_\_

4. Name of Judge assigned to your case \_\_\_\_\_

5. Approximate date of filing lawsuit \_\_\_\_\_

6. Is the case still pending? Yes \_\_\_\_ No \_\_\_\_

If NO, give the approximate date of disposition \_\_\_\_\_

7. What was the result of the case? (For example: Was the case dismissed? Was there judgment in your favor? Was the case appealed?) \_\_\_\_\_

\_\_\_\_\_

On  
other  
claims

- C. Have you filed other lawsuits in state or federal court otherwise relating to your imprisonment?

Yes \_\_\_\_ No xx

- D. If your answer to C is YES, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same format.)

1. Parties to the previous lawsuit:

Plaintiff \_\_\_\_\_

Defendants \_\_\_\_\_

2. Court (if federal court, name the district; if state court, name the county) \_\_\_\_\_

3. Docket or Index number \_\_\_\_\_

4. Name of Judge assigned to your case \_\_\_\_\_

5. Approximate date of filing lawsuit \_\_\_\_\_

6. Is the case still pending? Yes \_\_\_\_ No \_\_\_\_

If NO, give the approximate date of disposition \_\_\_\_\_

7. What was the result of the case? (For example: Was the case dismissed? Was there judgment in your favor? Was the case appealed?) \_\_\_\_\_

\_\_\_\_\_





NATURE OF ACTION

This is an action to recover money damages and other changes within the department of corrections. It seeks damages against some of the named defendants and not all of the defendants because some are covered by the 11th Amendment to the United States Constitution. The issues and or claims raised herein, arises out of defendants The City of New York, and the Bronx County District Attorney, New York County District Attorney, Brooklyn County District Attorney, Queens County District Attorney the legal Aid Society, the New York County Bar Association New York City Commissioner for New York City Department of Corrections and Mayor DeBlasio, Mayor of New York.

Each and every Defendant while acting under the Color of Law, Engaged in conduct either directly or indirectly, either they knew and tried to cover the Constitutional Violations up, or they should have known that the issues complained about herein, violated the plaintiffs constitutional rights.

The Eighth Amendment of the United States Constitution Forbids the defendants from inflicting cruel and unusual punishment upon plaintiffs, or inflicting any conditions and or treatment that amounts to cruel and inhumane, or treatment and or conditions that violates the 13th Amendment to the United States Constitution, against the infliction of Slavery.

1. This is a pro-se Civil Rights Action, commenced pro-se by plaintiffs, who are seeking to redress the constitutional rights that are arbitrarily, capriciously with malice and without regards for plaintiffs health, safety, life, conditions and following the laws that has been enacted by the Legislaure to ensure that all citizens, black, hispanic, white and any other minority shall be protected by the United States Constitution that excluded blacks because of slavery, but with the passing of the Bill of Rights in 1865, namely the Fourteenth Amendment thereof, that was duly incorporated into the Bill of rights to ensure that even blacks could not be denied or deprived of Duwe Process of Law before their life, liberty or property could be taken away. Nor denied or deprived of the Equal Protection of the Laws. This action seeks to remedy the constant and continuing constitutional violations by defendants, either individually and or collective, either directly or as a result of laws, policies, procedures, implemented that theyknew or should have known, would violate plaintiffs constitution rights to be free from cruel and unusual punishment, deprivation of life and liberty, false imprisonment, defective indictments, ineffective representation by attorney's who were, are systemically programmed to help the district attorney put men and women in prison, as a

result of defective grand jury proceedings, defective indictments, wrongful imprisonment, violations of health codes, sanitary codes, poisonous elements in Rikers Island that puts plaintiffs lives in constant danger, has already affected plaintiffs health to such a degree that the Rikers Island Medical Department at GMDC cannot do anything about it, does not have the adequate medical facilities to treat the medical illnesses that plaintiff has as a result of the diseases that plaintiffs are catching as a result of the numerous hazardous health conditions that will be more fully detailed herein Defendants, all, either individually or collectively has and continue to violate plaintiffs constitutional rights while acting under the color of law, pursuant to Title 18, Sections 241, and 242, Title 42, Sections 1983, 1985 and 1986, as well as violating the Fourth, Fifth, Sixth, Eighth, Thirteenth and Fourteenth Amendments of the United States, and the existing cases of laws, that will be briefed herein these moving papers.

2. This civil action is further being filed because of the violations of our First, Fifth, Sixth, Eighth, Thirteenth and Fourteen Amendments rights under the United States Constitution, and in the Interest of Justice, against each and every defendant

named herein, for continuing engaging, or allowing others to engage in conduct amounting too, but not limited to, conspiracy to violate plaintiffs constitutional rights or allowing them to be violated, or creating policies, procedures, rules and regulations that are designed to deprive plaintiffs and all those similar situated of our constitutional rights. Defendants know or should know that their actions violates plaintiffs constitutional rights, as well as should have the power, and does have the power and or asuthority to stop, prevent the violations named herein, but chooses to engage in a conspiracy against plaintiffs without regards for our life, safety, health, state of mind or constitutional rights to be free from cruel and unusual punishment and treatment as well as slavery in violation of the thirteenth amendment of the United States Constitution, because the law presumes each and every plaintiff and all those similarly situated, to be innocent until proven guilty.

3. The criminal justice system today, has been wrongfully designed to discriminate against blacks and hispanics, and has centered itself around locking up blacks and hispanics for the purposes of keeping this billion dollar slave plantations alive and generating at the expenses of the poor.

4. Plaintiff Dr. Richard Sunday Ifill, suffers from Prostate Cancer, Neuropathy Joint Diseases, asthma as well as spinal stenosis of the Lumbar Spine, as a result of constant exposure to these toxic poisonous gases, bull pen therapy of constantly going back and forth to court, sitting in cold bull pen cells, on steel benches for long periods of time, with out the necessary food and drink, plaintiffs is dying, his diseases has become 10 times worse and his results of all tests shows that they are extremely high. (See medical record, as Dr. Ifill's exhibit A) in support of the fact that his life is in immediate danger as a result of the City of New York and the other defendants failure to provide adequate protection and a safe and healthy prison that would be free from all of the diseases complained about in this suit.

Because of the constant exposure and other constitutional violations herein complained of, plaintiff Ifill suffers from a host of medical diseases that continues to get worse, because New York City Prison system's inability to provide the kind of medical care and treatment that he needs, and as a result of the same, plaintiff is dying and the defendants do not care, and this is why they are trying to cover each and every violation herein complained of up.



4. Plaintiffs Dr. Richard Sunday Ifill, Felix Morales, R. C olon, Clifford Taylor, Marcus Wilson, Moussa Doucoure, and all those similarly situated are all detainees who the law presumes to be innocent until proven guilty. Detainees who maintain all of our constitutional rights under the Bill of Right who are the subject and ~~victims~~ of conditions and treatment at Rikers Island that are causing our health to fail to such a degree that we are physically and mentally dying as a result of the ~~diseases~~ that we are forced to take in each and everyday.

Disease's that are killing us slowly, destroying our physical and mental health, while the defendants who are aware of the diseases that exist in Rikers Island, and yet for the sake of money they are making off of the backs of plaintiffs and all those similarly situated, defendants have totally disregarded our lives, safety, health and the fact that the law presumes each and every one of us, to be totally innocent, until proven guilty.

5. Each and every plaintiff, Dr. Ifill, Morales, Colon, Taylor, Wiulson and Doucoure, and all those similarly situated, are forced on a daily basis to breath in methane gas at a rate of

approximately 400% higher than the average person in society, because the 3 landfills at Rikers Island were all built the same, the Rikers Island Grounds all have therefore been exposed to several contaminants that are **slowly** killing plaintiffs, and is causing all kinds of health problems and diseases that Rikers Island medical department cannot treat, therefore each and every plaintiff are physically dying as a result of methane gas that we are forced to take into our system everyday. As well as the medical waste, because there are no regulations for landfills back in the 1920's when the beginning of the landfill project began, the medical waste built up on Rikers Island is slowly killing not only the plaintiffs but correctional staff as well who work on Rikers Island. The defendants are totally aware of these medical problems but totally disregard them because of the ignorance of the detainees who are placed here, and to close Rikers Island, would cost the investors billion upon billions of dollars, so instead they are allowing blacks, hispanics and other minorities lives to be destroyed, as the evidence will reveal. Plaintiffs are further forced to take into our systems without medical care and treatment the Toxic waste that defendants do not even try to get rid of, let alone control, they are for the sake of the dollar, allowing human beings lives to be destroyed. Not only are plaintiffs subjected each and every day, and has been for years, and continue to be, because of the constant leaking of methane gas poison that is and continue to

cause each and every plaintiff extreme symptoms that we are not being treated for, and the defendants are trying to keep those conditions covered up, so that the detainees will never become aware of the life threatening diseases we are forced to live under so that the system and the powers that be, can continue to generate billions and billions of dollars that they make off of the blacks and hispanics and other minorities that are here.

While it is true that all landfills may leak methane, but none of them leaks it at the rate that Rikers Island is leaking it. Rikers Island reate is 400 percent higher than normal which means that we are slowly dying, and suffering medical conditions for which there is no cure. The methane poisonous gas at Rikers island is constantly mixing with the medical and toxic materials from three mile island and Ellis Islands immigration rune as well as the burning of medical materials right here on the Island of Rikers, all are causing for alarm, because human lives are at stake and defendants do not give a damn about the lives or safety of plaintiffs and those similarly situated. Its all about making money for the rich and super powers of the United States, at the expense of poor blacks, hispanics and other minorities who the system continuing to hock up under the pretense of crime, but make sure that its blacks who are the victims.

Thus, the conditions at Rikers Island is being kept hidden from plaintiffs. Plaintiffs constitutional right to know and to be made aware of the fact that our lives are in grave danger as a result of the toxic waste's that are ~~existing~~ in Rikers Island and plaintiffs right to know laws and the reality that we face from day to day living breathing, eating, and being exposed 24 hours a day to the toxic waste, toxic chemicals, poisonous gas that even exist in the foods that is being fed to plaintiffs that defendants are aware of the fact that they are destroying plaintiffs, while defendants and the City of New York, the Mayor of New York, environmental protection administration, the office of air and radiation, office of prevention pesticides and toxic substances, the office of water and the occupational safety and health administration, the Governor, Congressman Rangel all the way up the White House are aware of the toxic gases, chemicals, waste, methane gas that is and will continue to affect plaintiffs central nervous systems, which are destroying them, but they have kept this matter quiet. The conditions in New York City Department of Corrections, Rikers Island, the toxic waste, poisonous gases is causing plaintiffs brain damage, nerve damage and the constant exposure to the same causes cancer, the poor living conditions that plaintiff is forced to live under, as will be fully briefed herein, is subjecting plaintiffs to a continuing pains, poor health, failing health, that defendants

are deliberately making it their business to hide from plaintiffs and the general prison population, because defendants are hiding and covering up the facts that plaintiffs are constantly exposed to toxic waste, toxic gas, poisonous elements that exist at Rikers Island, foreseeable damages is the result. Instead of defendants addressing the problems, the nerve damage is foreseeable and it is worse for plaintiffs because defendants are keeping the problems hidden. These facts have been diagnosed in the first claims filed in the 1950's the gag orders on these claims has made it hard to trace. But they are registered in the Courts all jurisdictions, in Congress and in the White House, that further the beds for plaintiffs, the poor food for plaintiffs is a further means to enforce the contamination on plaintiffs and all those similarly situated. Gas compressed meat and fish patties that is constantly being fed to plaintiffs are dangerous to our digestive systems with these other susceptible gases, conditions and problems.

Because of these diseases plaintiffs are further exposed to the Sick Land Syndrome and the Sick Building Syndrome. these conditions are known throughout the D.E.P., O.S.H.A and Hazmat.

These conditions that plaintiffs are constant exposed to

are ten times worst than lead based paint exposure, but neither the City of New York nor the other defendants has not effected a sure filed plan of presenting the necessary compensation for those who have been illegally exposed to the aforementioned carcinogens. Lead Based Paint dangers are listed in Giles v. Yi, 105 A.D. 3d 1313. 35 Injuries came from lead based paint alone, mean while plaintiffs have Medical, Toxic and Methane Gas Exposure that has and continue to causes plaintiffs various diseases, injuries that cannot be repaired. Irreversible Brain Damage are the least of plaintiffs problems. Some of the Brain damages that these toxic and poisonous chemicals, gases that plaintiffs are exposed to each and everyday are unavailable to be detected on EEG 131 Misc. 2d 346 Classen v. State 12-12-85 with no warning posted all of the defendants are responsible. This is a direct violation of Labor Law 200. Thus any filed report, argument or litigation shall not be deemed as cause for expulsion of employment pursuant to Executive Law, 296- 296- a respectively.

Plaintiffs are further being exposed to Asbestos on a daily basis, as well as have been constantly exposed to leaking Asbestos that are in walls, ceiling, medical facility, in the gym area's in the showers, bathroom and even in the kitchen and because of such, plaintiffs health has been and continue to be in grave danger.



5. The evidence herein, will further reveal that plaintiffs has been and continue to be subjected to ollegal mattresses that continues to cause plaintiffs extreme pain, spinal injuries, back injuries, and other injuries that the medical department at GMDC, C-73 are incapable of treating, has failed to adequately treat,as well as continue to deny plaintiffs adequate medical care and treatment. All of the mattresses issued at GMDC, C-73 and the other jails in New York City Department of Corrections are illegal because the beds are not standard by federal stand-ards because they are part of a mattress set of which is incom-plete. The set was broken up and thus it was placed on a violation foundation of many base for the mattresses of which is called a sled. The sled was made to set on a boat by the Bob Barker Company. Thus the missing boat for the sled was a fore-seeable travesty and calamity of which is causing plaintiffs and class to sudden suffering of significant and atypical hardship as a result of receiving back pains plaintiffs did not have prior to coming to Rikers Island or to the Department of Corrections.

6. Plaintiffs have and continue to be imprisoned as a result of defective alleged indictments that violates the Fifth Amendment, violates the Fourteenth Amendment as well as violate the law enacted by Congress and the Senate, signed into Law by the president of the United States for all Courts to adhere to. the alleged indictments exhibited herewith does not contained the Grand Jury Seal, has not been certified, does not comply with

the law that says that the District Attorney has the authority to ~~make~~ up his own verison of an indictment, or to move away from the enacted laws set forth by the Legislature. Criminal Procedure Law, Section 200.50 (8) and (9).

Criminal Procedure Law, Section 200.50 clearly states that an indictment "must" [contain] and than paragraphs 1-9 describes the exact nature of what all, not some, but all indictments must contain. The exhibits herewith, demonstrates that the Courts, the District Attorney's and attorney's who are assigned to represent blacks and hispanics have been violating the statutory guidelines for years and brushing the matter under the table in order to keep this now billion dollar business filled with blacks, hispanics and other minorities, who are legally considered slaves, but the matter covered up because it casts a negative image and light on the criminal justice system. The Courts, the District Attorney's, the Legal Aid Society are aware of this constitutional violation, but keeps it covered up with lies, and continuing constitutional violations, human rights violations and civil rights violations. Although incorporated into the Bill of Rights, Article 1, Section 6 of New York States Constitution does permit an accused to waive

an indictment by a Grand Jury and consent to be prosecuted by an information filed by the prosecutor, provided that the defendant signs in open Court in the presence of the Judge, the prosecutor and counsel...even this clause in the Bill of Rights, contradicts the United States Constitution, which controls the United States. It was written by our Founding Fathers, signed by 56 respected individuals to be the hall mark of the land, it clearly states in the Fifth Amendment that no criminal case can be prosecuted in the Supreme Court unless on an indictment handed down by the Grand Jury. Article 1, Section 6 of the Bill of Rights is therefore, unconstitutional and violates plaintiffs constitutional rights.

The letter enclosed herewith by Administrative Judge Robert Torres recognizes that this matter is a growing problem, yet he himself is one of the violators of it. prosecutors information is unconstitutional to try cases in the Supreme Court, because the 5th Amendment does not provide for it, nor does any other Amendment in the United States Constitution. Nor is any of the defendants authorized to create their own means of indicting cases and trying them in the Supreme Court, that contradicts the united States Constitution.

6-A. The water system including the pipes that it runs through, is so contaminated, filled with intoxic waste, germs, and a mountain of diseases that plaintiffs constantly drink each and everyday, to such a degree that our health is in constant danger, our lives are greatly shorten as a result of the water, to such a degree that each of us, and class, are dying as a result of drinking the water here in New York City Department of Corrections, namely Rikers Island, while defendants who are aware of these health life threatening diseases, but for the sake of money, they are trying to keep the matter a secret, regardless to how many people die as a result of the same. Correction officers have died as a result of the diseases and toxic waste on Rikers Island.